



March 1, 2019

Frederick W. Hitz III
(907) 265-5612
rhitz@gci.com

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Connect America Fund – Alaska Plan*, WC Docket No. 16-271, Required Network Mapping Submission

CONFIDENTIALITY REQUEST

Dear Ms. Dortch:

The attached letter explains that GCI Communication Corp. and its subsidiaries United Utilities, Inc. and Yukon Telephone Co., Inc. (together, “GCI”) are submitting confidential network information in an effort to comply as fully as possible with the network mapping requirements of the Alaska Plan. The attached letter itself does not contain confidential information but the attached CDs do. The Wireline Competition and Wireless Telecommunications Bureaus already determined that the network location information required by the network mapping requirements, which is contained on the CDs, is likely to be confidential. The Bureaus established an abbreviated means for requesting confidentiality consistent with 47 C.F.R. § 0.459(a)(4).¹ As explained in the attached letter, GCI is unable to file the network information in USAC’s HUBB and is therefore unable to take advantage of the abbreviated means for requesting confidentiality. Therefore, GCI submits this request for confidential treatment pursuant to Sections 0.457 and 0.459 of the Commission’s rules. 47 C.F.R. §§ 0.457, 0.459.

¹ See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068, 2082 (Wireline Comp. & Wireless Telecomm’n Burs. 2018) (“The location of companies’ links and nodes are likely to contain confidential data. Accordingly, this data filing will use an abbreviated means to allow submitters to request confidentiality, consistent with 47 CFR § 0.459(a)(4). Filing material for this data collection will be deemed to be a request under section 0.459 that the material not be made publicly available.”).

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In support of this request, GCI hereby states as follows:

1. Identification of Specific Information for Which Confidential Treatment Is Sought (Section 0.459(b)(1))

GCI seeks confidential treatment with respect to the information on the attached CDs, which reflects the locations of specific elements of GCI's communications network, including fiber and microwave links, central offices, wireless towers, certain customer locations, and other network locations (the "Confidential Information").

2. Description of Circumstances Giving Rise to the Submission (Section 0.459(b)(2))

GCI is disclosing the Confidential Information pursuant to the network mapping requirements of 47 C.F.R. § 54.316(a)(6) and *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068 (Wireline Comp. & Wireless Telecomm'ns Burs. 2018). GCI is unable to submit the information via the HUBB and therefore submits the information on CD.

3. Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret or Is Privileged (Section 0.459(b)(3))

The Confidential Information contains sensitive commercial information. It includes highly detailed information regarding GCI's network assets, the specific nature and locations of which could provide its competitors with a competitive advantage in planning their networks or market strategies. In addition, the Confidential Information contains information about GCI's customers and may contain Customer Proprietary Network Information covered by 47 U.S.C. § 222 and the Commission's implementing rules. Finally, disclosure of the Confidential Information could expose GCI's network to malicious actors who could attempt to disrupt communications, including emergency calling and communications provided to first responders and other critical customers.

4. Explanation of the Degree to Which the Information Concerns a Service that Is Subject to Competition (Section 0.459(b)(4))

The depicted facilities are used to provide services that are subject to competition; GCI faces competition from other network providers in Alaska.

5. Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (Section 0.459(b)(5))

Disclosure would provide GCI's competitors with detailed information regarding the locations of its network assets and community anchor institution customers. Competitors could use this information to GCI's disadvantage by strategically planning their network expansions or customer marketing.

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6. Identification of Any Measures Taken to Prevent Unauthorized Disclosure (Section 0.459(b)(6))

The Confidential Information has been kept private and internal to GCI and its counsel, authorized agents, and contractors.

7. Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (Section 0.459(b)(7))

GCI has not previously disclosed to third parties, other than its counsel and its authorized agents and contractors, any of the Confidential Information.

8. Justification of Period During Which the Submitting Party Asserts that Material Should Not Be Available for Public Disclosure (Section 0.459(b)(8))

GCI requests that the Confidential Information remain unavailable for public disclosure indefinitely. Network assets are long-lived, and GCI cannot forecast a point at which the information would no longer be sensitive.

Please contact me should you have any questions.

Respectfully submitted,



Frederick W. Hitz, III
Vice President, Regulatory Economics
& Finance
GCI Communication Corp.
2550 Denali Street, Suite 1000
Anchorage, AK 99503

cc: Jesse Jachman
Ying Ke
Jonathan Lechter
Alex Minard
Matthew Warner



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Re: *Connect America Fund – Alaska Plan*, WC Docket No. 16-271, Required Network Mapping Submission

Dear Ms. Dortch:

As participants in the Alaska Plan, GCI Communication Corp. and its wholly owned subsidiaries United Utilities, Inc. and Yukon Telephone Co., Inc. (together, “GCI”) must file maps depicting portions of their microwave and fiber networks and associated nodes. This year’s filing is due to be filed in the USAC HUBB by March 1, 2019.

The filing instructions adopted by the Wireline Competition and Wireless Telecommunications Bureaus require that the location information be accurate to within 7.6 meters at a 95 percent confidence level consistent with FGDC-STD-007, 3-1998. The instructions also require that an officer of the company certify that the information is accurate and complete.¹

The Alaska Telecom Association filed a petition for waiver of the accuracy standard with regard to the buried and aerial fiber and also submitted an alternative proposal.² The Bureaus

¹ See *Connect America Fund – Alaska Plan*, Order on Reconsideration, 33 FCC Rcd. 2068, 2081-87 (Wireline Comp. & Wireless Telecomm’n Burs. 2018) (“Network Mapping Instructions”).

² See Petition for Limited Waiver of Alaska Telecom Association To Permit Commonly Accepted Industry Levels of Spatial Accuracy for Middle Mile Route Mapping, WC Docket No. 16-271 (filed Feb. 6, 2019); Letter from Christine O’Connor, Alaska Telecom Association, to Marlene H. Dortch, Secretary, FCC, WC Docket No. 16-271 (filed Feb. 19, 2019) (proposing a standard of 50 meters and 80% confidence for buried and aerial fiber).

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denied the waiver.³ GCI wishes to comply to the fullest extent possible with the requirement to file its network location information by today's deadline but cannot certify that all buried and aerial fiber information is locationally accurate to the specified standard. Because GCI is unable to make the certification, it is also unable to submit its filing via USAC's HUBB.

In an effort to ensure that the Bureaus have GCI's network information in a timely way and to comply with the mapping requirement to the fullest extent possible, GCI submits on the attached CDs its network location information. GCI requests confidentiality for the information on the CDs, which the Bureaus already found likely to be confidential and subject to an abbreviated means for requesting confidentiality consistent with 47 C.F.R. § 0.459(a)(4).⁴

As an officer of GCI Communication Corp., I certify that the links depicting aerial and buried fiber are accurate to within 50 meters to an 80 percent confidence level. I also certify that all other information is accurate to within 7.6 meters to a 95 percent confidence level.

Please contact me should you have any questions.

Respectfully submitted,



Frederick W. Hitz, III
Vice President, Regulatory Economics &
Finance
GCI Communication Corp.
2550 Denali Street, Suite 1000
Anchorage, AK 99503

cc: Jesse Jachman (with confidential CD)
Ying Ke (with confidential CD)
Jonathan Lechter
Alex Minard
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³ See *Connect America Fund – Alaska Plan*, Order, DA 19-136, WC Docket No. 16-271 (Wireline Comp. & Wireless Telecomm'ns Burs. Mar. 1, 2019).

⁴ See Network Mapping Instructions at 2082 ("The location of companies' links and nodes are likely to contain confidential data. Accordingly, this data filing will use an abbreviated means to allow submitters to request confidentiality, consistent with 47 CFR § 0.459(a)(4). Filing material for this data collection will be deemed to be a request under section 0.459 that the material not be made publicly available.").